STATEMENT OF BASIS

as required by LAC 33:1X.3109, for draft Louisiana Pollutant Discharge Elimination System Permit No. <u>LA0055328</u>; AI 4300; <u>PER20040001</u> to discharge to waters of the State of Louisiana as per LAC 33:1X.2311.

The permitting authority for the Louisiana Pollutant Discharge Elimination System (LPDES) is:

Louisiana Department of Environmental Quality

Office of Environmental Services

P. O. Box 4313

Baton Rouge, Louisiana 70821-4313

I. THE APPLICANT IS: Town of Youngsville

Youngsville Wastewater Treatment Facility

P.O. Box 592

Youngsville, LA 70592

II. PREPARED BY:

Jim Bondy

DATE PREPARED:

April 5, 2006

III. PERMIT ACTION:

reissue LPDES permit <u>LA0055328</u>, AI <u>4300</u>; <u>PER20040001</u>

LPDES application received: October 5, 2004

NPDES permit issued: February 1, 1994 NPDES permit expired: January 31, 1999

LPDES permit issued: March 1, 2000 LPDES permit expired: February 28, 2005

IV. <u>FACILITY INFORMATION:</u>

- A. The application is for the discharge of treated sanitary wastewater from a publicly owned treatment works serving the Town of Youngsville.
- B. The permit application does not indicate the receipt of industrial wastewater.
- C. The facility is located at 416 Railroad Avenue in Youngsville, Lafayette Parish.
- D. The treatment facility consists of an activated sludge treatment system with aeration. Disinfection is by chlorination.

E. Outfall 001

Discharge Location:

Latitude 30° 5' 45" North

Longitude 92° 0' 8" West

Description:

treated sanitary wastewater

Design Capacity

0.60 MGD

Type of Flow Measurement which the facility is currently using:

Ultrasonic flow meter with continuous recorder

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-----RECEIVING WATERS:

The discharge is into Bayou Parc Perdu in segment 060901 of the Vermilion - Teche Basin.

The designated uses and degree of support for Segment 060901-of the Vermilion - Teche Basin are as indicated in the table below!':

Overall Degree of Support for Segment	Degree of Su	pport of Each	Use				
Partial	Primary Contact Recreation	Secondary Contact Recreation	Propagation of Fish & Wildlife	Outstanding Natural Resource Water	Drinking Water Supply	Shell fish Propagation	Agriculture
	Not Supported	Full	Not Supported	N/A	N/A	N/A	N/A

^{1/}The designated uses and degree of support for Segment 060901 of the Vermilion - Teche Basin are as indicated in LAC 33:IX.1123.C.3, Table (3) and the 2004 Water Quality Management Plan, Water Quality Inventory Integrated Report, Appendix A, respectively.

VI. ENDANGERED SPECIES:

The receiving waterbody, Subsegment 060901 of the Vermilion - Teche Basin, is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U. S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated October 21, 2005 from Watson (FWS) to Gautreaux (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. It was determined that the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat.

VII, HISTORIC SITES:

The discharge is from an existing facility location, which does not include an expansion beyond the existing perimeter. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the 'Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits' no consultation with the Louisiana State Historic Preservation Officer is required.

VIII. PUBLIC NOTICE:

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation
Office of Environmental Services Public Notice Mailing List

For additional information, contact:

Jim Bondy
Water and Waste Permits Division
Department of Environmental Quality
Office of Environmental Services
P. O. Box 4313
Baton Rouge, Louisiana 70821-4313

IX. PROPOSED PERMIT LIMITS:

Subsegment 060901 of the Vermilion - Teche River Basin, is not listed on LDEQ's Final 2004 303(d) list as impaired. However, subsegment 060901 was previously listed as impaired for suspended solids/turbidity/siltation, nutrients, phosphorus, organic enrichment/low DO, pathogen indicators, and Carbofuran, for which the below TMDL's have been developed. The Department of Environmental Quality reserves the right to impose more stringent discharge limitations and/or additional restrictions in the future to maintain the water quality integrity and the designated uses of the receiving water bodies based upon additional TMDL's and/or water quality studies. The DEQ also reserves the right to modify or revoke and reissue this permit based upon any changes to established TMDL's for this discharge, or to accommodate for pollutant trading provisions in approved TMDL watersheds as necessary to achieve compliance with water quality standards.

As per the TMDL for TSS, Turbidity, and Siltation for the 15 Subsegments in the Vermilion River Basin, point source loads are so small as to be insignificant, and because effective policies are in place to limit TSS discharges, no specific reductions from point sources are required. Therefore, TSS limits will remain as previously permitted.

As per the October 2000 LA TMDL Delist (Federal Register Notice: Vol. 66, Num. 66, pages 18087-18089, 4/5/2001), assessment of new data and information shows this segment is meeting water quality standards for turbidity. Therefore, requirements for Turbidity will not be placed in this permit.

As per the Bayou Petite Anse TMDLs for Dissolved Oxygen and Nutrients, "No point source upgrades are recommended because there are no point source discharges that have any significant impact on DO in Bayou Petite Anse." Therefore, limits for BOD₅ will remain as previously permitted and no limits will be required for nutrients and phosphorus.

The TMDL for the Pesticide Carbofuran in the Mermentau and Vermilion-Teche River Basins was finalized on March 21, 2002. The TMDL states that there are no known point source discharges of Carbofuran in the Mermentau Basin, and therefore no allocation was given to point sources. There is one point source in the Vermilion-Teche (FMC Corp. LA0064360) but they do not discharge Carbofuran. Likewise no allocation was given to point source discharges in the Vermilion-Teche River Basin.

The EPA Drafted MERCURY TMDLS FOR SUBSEGMENTS WITHIN MERMENTAU AND VERMILION-TECHE RIVER BASINS was final on April 5, 2001 by Federal Register Notice. Some point sources, particularly larger discharges into small water bodies may represent significant site specific (local) sources of mercury and could contribute to mercury bioaccumulation which, individually or collectively, may represent significant sources of mercury. Those large facilities identified as having "reasonable potential" for exceeding narrative and/or numeric standards for protection of human health will be required to monitor mercury in their discharges.

A-review was conducted of the Town of Youngsville's wastewater treatment plant non-residential customers (See attached list) to identify potential sources of mercury to the wastewater treatment system. This review did not demonstrate a significant number of non-residential customers recognized as potential sources of mercury to wastewater treatment systems. Based on this review and assessment it is determined that the discharge from the Town of Youngsville Wastewater Treatment Facility does not possess the reasonable potential for exceedence of numeric mercury water quality standards and no effluent limitations or requirements will be placed in the permit at this time.

Final Effluent Limits:

OUTFALL 001

Final limits shall become effective on the effective date of the permit and expire on the expiration date of the permit.

Effluent Characteristic	Monthly Avg. (lbs./day)	Monthly Avg.	Weekly Avg.	Basis
BOD₅	50	10 mg/l	15 mg/l	Limits are set in accordance with the Bayou Petite Anse TMDLs for Dissoved Oxygen and Nutrients and the previous permit.
TSS	75	15 mg/l	23 mg/l	Limits are set in accordance with the TMDL for TSS, Turbidity and Sitlation for the 15 Subsegments in the Vermilion River Basin, and the previous permit.

Other Effluent Limitations:

1) Fecal Coliform

The discharge from this facility is into a water body which has a designated use of Primary Contact Recreation. According to LAC 33:IX.1113.C.5.b.i, the fecal coliform standards for this water body are 200/100 ml and 400/100 ml. Therefore, the limits of 200/100 ml (Monthly Average) and 400/100 ml (Weekly Average) are proposed as Fecal Coliform limits in the permit. These limits are being proposed through Best Professional Judgement in order to ensure that the water body standards are not exceeded, and due to the fact that existing facilities have demonstrated an ability to comply with these limitations using present available technology.

2) pH

According to LAC 33:IX.3705.A.1., POTW's must treat to at least secondary levels. Therefore, in accordance with LAC 33:IX.5905.C., the pH shall not be less than 6.0 standard units nor greater than 9.0 standard units at any time.

3) Solids and Foam

There shall be no discharge of floating solids or visible foam in other than trace amounts in accordance with LAC 33:IX.1113.B.7.

X. PREVIOUS PERMITS:

LPDES Permit No. LA0055328: Issued: March 1, 2000

Expired: February 28, 2005

Effluent Characteristic	Discharge Lim	<u>itations</u>	Monitoring Req	Monitoring Requirements	
	Daily Avg.	Daily Max.	Measurement	Sample	
			Frequency	Type	
Flow	Report	Report	Continuous	Recorder	
BOD ₅	10 mg/l	15 mg/l	2/month	Grab	
TSS	15 mg/l	23 mg/l	2/month	Grab	
Fecal Coliform Colonies	200	400	2/month	Grab	

NPDES Permit No. LA0055328: Issued: February 1, 1994

Expired: January 31, 1999

Effluent Characteristic	Discharge Limitations		Monitoring Requirements	
	Daily Avg.	Daily Max.	Measurement	<u>Sample</u>
			Frequency	<u>Type</u>
Flow	Report	Report	Continuous	Recorder
BOD ₅	10 mg/l	15 mg/l	2/month	Grab
TSS	15 mg/l	23 mg/l	2/month	Grab
Fecal Coliform Colonies	200	400	2/month	Grab

XI. <u>ENFORCEMENT AND SURVEILLANCE ACTIONS:</u>

A) Inspections

A review of the files indicates that the most recent inspection of this facility was performed on June 13, 2005 by LDEQ personnel.

Findings and/or Violations -

- 1. Facility is operating under interim limits set forth in CO-WE-C-01-0046.
- 2. Records review revealed no recent excursions.
- 3. Plant is well kept and operating properly except for some weeds growing in the drying beds.
- 4. Effluent was clear. Design capacity is exceeded due to I & I.
- 5. No areas of concern were noted.

B) Compliance and/or Administrative Orders

A review of the files indicates the following most recent enforcement actions administered against this facility:

LDEQ Issuance:

Docket # - WE-C-01-0046 Date Issued - July 24, 2001

C) DMR Review

A review of the discharge monitoring reports for the period beginning January 1, 2004 through October 31, 2005 has revealed one violation as shown below.

Month	Parameter	DMR Reported Value	Permit Limit
June 2004	Fecal Coliform, Weekly Avg.	>1000 colonies/ml	400 colonies/ml

XII. <u>ADDITIONAL INFORMATION:</u>

The Department of Environmental Quality reserves the right to impose more stringent discharge limitations and/or additional restrictions in the future to maintain the water quality integrity and the designated uses of the receiving water bodies based upon additional water quality studies and/or TMDL's. The DEQ also reserves the right to modify or revoke and reissue this permit based upon any changes to established TMDL's for this discharge, or to accommodate for pollutant trading provisions in approved TMDL watersheds as requested by the permittee and/or as necessary to achieve compliance with water quality standards. Therefore, prior to upgrading or expanding this facility, the permittee should contact the Department to determine the status of the work being done to establish future effluent limitations and additional permit conditions.

Final effluent loadings (i.e. lbs/day) have been established based upon the permit limit concentrations and the design capacity of 0.60 MGD.

Effluent loadings are calculated using the following example:

BOD: 8.34 lb/gal x 0.60 MGD x 10 mg/l = 50 lb/day

The Monitoring Requirements and Sample Types as shown below are standard for facilities of flows between 0.5 and 1.0 MGD. However, the Frequency of Sampling for BOD₅, TSS, Fecal Coliform, and pH has been reduced from 1/week to 2/month, based on the EPA Guidance for Performance Based Reductions of Monitoring Frequencies.

Effluent Characteristics	Monitoring Requirements		
	Measurement	<u>Sample</u>	
	Frequency	<u>Type</u>	
Flow	Continuous	Recorder	
BOD ₃	2/month	3 Hr. Composite	
Total Suspended Solids	2/month	3 Hr. Composite	
Fecal Coliform Bacteria	2/month	Grab	
pH	2/month	Grab	

Pretreatment Requirements

Based upon consultation with LDEQ pretreatment personnel, general pretreatment language will be used due to the lack of either an approved or required pretreatment program.

XIII TENTATIVE DETERMINATION:

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to reissue a permit for the discharge described in this Statement of Basis.

XIV REFERENCES:

Louisiana Water Quality Management Plan / Continuing Planning Process, Vol. 8, "Wasteload Allocations / Total Maximum Daily Loads and Effluent Limitations Policy," Louisiana Department of Environmental Quality, 2005.

Louisiana Water Quality Management Plan / Continuing Planning Process, Vol. 5, "Water Quality Inventory Section 305(b) Report," Louisiana Department of Environmental Quality, 1998.

Louisiana Administrative Code, Title 33 - Environmental Quality, Part IX - Water Quality Regulations, Chapter 11 - "Louisiana Surface Water Quality Standards," Louisiana Department of Environmental Quality, 2004.

<u>Louisiana Administrative Code, Title 33 - Environmental Quality, Part IX - Water Quality</u>
<u>Regulations, Subpart 2 - "The LPDES Program,"</u> Louisiana Department of Environmental Quality, 2004.

<u>Low-Flow Characteristics of Louisiana Streams</u>, Water Resources Technical Report No. 22, United States Department of the Interior, Geological Survey, 1980.

Index to Surface Water Data in Louisiana, Water Resources Basic Records Report No. 17, United States Department of the Interior, Geological Survey, 1989.

<u>LPDES Permit Application to Discharge Wastewater</u>, Town of Youngsville, Youngsville Wastewater Treatment Facility, October 5, 2004.